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January 28, 2021

Hon. Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Jimenez, et al.*
Docket No.: 18-CR-879 (SHS)

Dear Judge Stein:

I am counsel to Defendant Irelene Nunez. I write to request that the Court modify Ms. Nunez's conditions of release to permit her to travel to the Middle District of Pennsylvania from February 13-14, 2021.

Ms. Nunez wishes to travel for a small family get together to celebrate her nephew's first birthday. If permitted to travel, Ms. Nunez would stay at 876 Mosiers Knob Road, East Stroudsburg, PA 18301.

By way of background, on November 14, 2018, the Hon. Barbara C. Moses ordered Ms. Nunez released on a \$150,000 personal recognizance bond secured by the signatures of two financially responsible persons. Ms. Nunez's pretrial supervision was to be as directed by Pretrial Services, and her travel was limited to the Southern and Eastern Districts of New York. The Court has since extended Ms. Nunez's travel perimeter to include the District of New Jersey. Since her release 26 months ago, Ms. Nunez has remained fully compliant with all of the terms of her release.

I have spoken to the government, by AUSA Ni Qian, Esq., and they do not object to this request. Pretrial Services, by Officer Madalyn Toledo, takes no position on this request, but notes Ms. Nunez's continued compliance with supervision.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

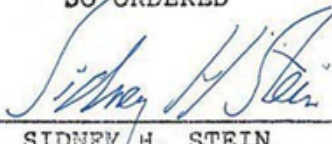
/s/ Edward V. Sapone

Edward V. Sapone

Cc: AUSA Ni Qian, Esq.
AUSA Daniel Nessim, Esq.
PTSO Madalyn Toledo

Application granted.

**Dated: New York, New York
January 29, 2021**

SO ORDERED


SIDNEY H. STEIN
U.S.D.J.